

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

T-MOBILE US, INC., ET AL.,

Defendants.

**Case No. 2:20-CV-281-JRG**

**JURY TRIAL DEMANDED**

Honorable Rodney Gilstrap

*FILED UNDER SEAL*

**DECLARATION OF ANDREW CHOUNG IN SUPPORT OF  
OPPOSITION BY PLAINTIFF KAIFI  
TO DEFENDANTS' MOTION TO STRIKE PLAINTIFF'S P.R. 3-1(E) DISCLOSURE**

I, Andrew Y. Choung, do hereby declare and state the following:

1. I am a partner with the law firm Nixon Peabody LLP, which represents Plaintiff KAIFI, LLC (“KAIFI”) in this dispute with Defendants T-Mobile US, Inc. and T-Mobile USA, Inc.’s (“T-Mobile”).

2. I submit this declaration in support of *KAIFI’s Opposition to Defendants’ Motion to Strike Plaintiff’s P.R. 3-1(E) Disclosure*.

3. If called as a witness, I could and would testify competently to this information set forth in this declaration.

4. Attached hereto as Exhibit A is a true and accurate copy of KAIFI’s First Supplemental Responses and Objections to T-Mobile’s First Set of Interrogatories (Nos. 1-11), served on March 15, 2021.

5. Attached hereto as Exhibit B is a true and accurate copy of excerpts of the transcript from the deposition of Dong-ho Cho from this litigation, taken on July 8, 2021.

6. Attached hereto as Exhibit C is a true and is a true and accurate copy of excerpts of the transcript from the deposition of Dong-ho Cho from this litigation, taken on July 9, 2021.

7. Attached hereto as Exhibit D is a true and accurate copy of documents bearing Bates Numbers DONGHOCHO 0000001–0000483, where DONGHOCHO0000001–0000136 are the Korean invention disclosure documents, which were produced by KAIFI on March 15, 2021, and DONGHOCHO\_0000137-0000483 are the same set of Korean documents attaching English translations, which were produced by KAIFI on April 22, 2021.

8. Attached hereto as Exhibit E is a true and is a true and accurate copy of excerpts of the transcript from the deposition of Dong-ho Cho from the *AT&T Litigation*, taken on April 26, 2020.

9. Attached hereto as Exhibit F is a true and accurate copy of T-Mobile's P.R. 3-3 Invalidity Contentions, served January 15, 2021.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 3, 2021 in Los Angeles, California

/s/ Andrew Y. Choung  
Andrew Y. Choung